

John Lawrence; Gaddy, Esq.

State Bar of California 74431 - 2022 ACTIVE

2256 Wolfberry Way

Santa Rosa, California 95404

415-601-9942

jhngaddy@gmail.com

**FILED**  
NOV 10 2022  
U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PETER R. FADER**

**dba Urchin Capital Partners**

**dba Urchin Partners LLC,**

**Debtor.**

**Case No.: 08-30119-DM**

## **Chapter 7**

### **TRUSTEE'S MOTION TO APPROVE COMPROMISE OF ADVERSARY PROCEEDING AGAINST STEVEN R. BOAL AND QUOTIENT TECHNOLOGY PURSUANT TO FRBP 9019**

**Hearing Date:**

**Date: November 15, 2022**

**Time: 11:30 a.m.**

**Place: Telephonically or by Video**

**Judge: Honorable Dennis Montali**

To the Court and Most Honorable Judge Dennis Montale

My name is John Lawrence Gaddy and I am an **Unsecured Creditor** in this matter. **Case No. 08-30119-DM.**<sup>1</sup>

When I think about this building at 450 Golden Gate Avenue today, it is a reminder that I clerked in this building about 49 years ago for the Judges of the National Labor Relations Board as a 3<sup>rd</sup> year law student. How time flies.

I am here today before because none of the lawyers and their clients would give me a 3 month extension of this hearing despite knowing the following:

1. All of these competitive lawyers are in agreement that this settlement agreement that this settlement agreement is a very good agreement and is very good for all of the creditors, despite the fact it discriminates against unsecured creditors.

---

I am an unsecured creditor from a lawsuit I brought against debtor Fader out of damages to me arising out of his two years being a tenant of mine. See EXHIBIT B.

2. All of these very competitive lawyers are all in agreement that they wouldn't give me a reasonable 3 month extension of this November 15 hearing despite the extreme burden it put on me to create these objections – see as follows.<sup>2</sup>
3. Through no fault of mine I have not received any legal papers in this case since 12 /20 – See EXHIBITS A AND E
4. I have not practiced any law since over 30 years ago. I have never litigated a case in my life to trial. What I know about bankruptcy law I am learning from this case.
5. I do not have a lawyer representing me because I am indigent. I am legally handicapped over 10 years and have not worked for ten years. We rent, have no assets or investments, own a 10 year old car, have no money in any bank and I am supported by my wife.
6. I have not worked for ten years. I suffer from chronic fatigue and can fall asleep instantly day or night. In the last 7 years I have lost my left eye and am totally blind in it and have a cataract in my right eye that makes my world darker and sometimes very blurry. (See EXHIBIT C)

---

<sup>2</sup> Price fixing is an agreement (written, verbal, or inferred from conduct) among competitors to raise, lower, maintain, or stabilize prices or price levels.

7. They know I am elderly (age 77)) and am severely handicapped with among other things extreme loss of vision. (See EXHIBIT C)
8. They know that I had 15 legal documents to read for this hearing.
9. They knew I had a very, very short amount of time to put together any legal objections for this hearing and did not think I could do it.
- 10.** These lawyers knew all of the above and after many oral and written requests for a very reasonable 3 month extension still refused to give me a voluntary 3 month extension of this November 15 hearing.

***“People of the same trade seldom meet together, even for merriment and diversion, but the conversation ends up in a conspiracy against the public, or in some contrivance to raise prices.”***

***Adam Smith***

***WEALTH OF NATIONS***

***MY PRAYER TODAY - before this Court and the Most Honorable Judge Montali:***

- 1. I pray that I get a 3 month extension of this hearing in the interest of justice.**

Because I have not received any legal documents from the Trustee and her counsel in the last two years (See EXHIBIT E), and I haven't heard from my legal advisor bankruptcy attorney Mark Romeo since 12/20 (See EXHIBIT A) to no fault of mine, I thought this case was dead and over.

I have worked every day since receiving Mr. Romeo's 12/20 email trying to understand this case and have the Trustee's counsel to give me a reasonable 3 month extension so I can read all of the legal document I have not seen, study the 15 legal documents sent by Mr. Romeo and the Trustee's counsel, and to research the law, and to write my objections for this November 15 hearing.

This is an impossible task for me to complete for the reasons stated above and below.

I am severely disabled Indigent and handicapped person, especially with a significant loss of vision. (See EXHIBIT C), I have no money to hire a lawyer, I haven't done any legal work in over 30 years, I am not a litigator, and what I know about bankruptcy law I am learning from this case.

Knowing all of the above, the Trustees counsel and the other lawyers unreasonably refuse to give me any extension of this hearing – because they say “it is not in these best interest to do so.”

If I am not given at least a 3 month extension of this hearing, my constitutional right to a fair and just hearing will be violated and I will be very prejudiced.

By this letter I am informing this court that I believe many laws will be broken and I need time to research the law relevant to this case.

If I am not granted this reasonable 3 month extension of this hearing I may lose many legal rights:

1. My constitutional rights will be violated by not allowing me time to properly prepare for this hearing by giving me a most reasonable extension of 3 months for this hearing.

2. My rights under the American Disability Act and Elder Abuse laws have been violated.

3. The Law of Contracts has been broken in this case.

4. State and Federal Antitrust laws – in particular price fixing and group boycott laws may have been broken.

4. And most importantly, the rules of fair play and being a decent person have been violated.



**2 I pray to this court to provide free legal counsel for me and all and every cost related to this litigation.**

I have not worked in more than ten years and I have made to provide a lawyer to help represent no money during that time. I have no money in the bank, my car is over 10 years old, we rent and we don't own anything. I am supported by my wife who has Parkinson's disease. (See EXHIBIT C)

Indigent people have been given lawyers free of charge and all expenses payed in other cases in the interest of justice.

All of these four parties have lawyers representing them. I cannot get a fair trial or hearing without a trial lawyer with great bankruptcy lawyer assisting me too.

If I do not get a free lawyer and all of my costs paid for many of my constitutional rights, among other laws, will be violated.

Why not this case too.

I have to represent myself today because I cannot afford an attorney much less costs.

By this letter I am asking the Honorable Court to give me free legal counsel with a deep understanding of bankruptcy law and United States Constitutional Law and all of the funds money necessary to pay all court costs, deposition costs, copy of transcripts and any and all costs related to this issue and all of the other issues in this case.

**3 By this letter and Exhibits I am introducing myself WHO I AM to this most Honorable Judge. (See Exhibit)**

By this letter let this court know that I may be old at age 77 and very handicapped, and have not done any legal writing in over 30 years. However, I am not dead yet.

1. I was number 3 in my first year of law school at the University of San Francisco School of Law (1970 – 1973).
2. I clerked for the Judges of the National Labor Relations board my third year of law school in 1973.
3. I spent my first 5 years working in a law firm, in the Office of Frederick P Furth under the mentorship of John H. Boone. These lawyers practiced plaintiff complex business law generally, and Plaintiffs Antitrust law most specifically – state and federal price fixing cases.
4. During my 5 years working with John Boone, I worked a minimum of 6 days a week, about 10 hours a day, week after week, month after month, and year after year.
5. I worked in my family real estate business and even got a real estate broker's license off and on my whole life.

6. After my sister Leslie passed away my family and I hired a lawyer to defend a wrongful death case brought against my sister's estate. I caught the lawyer fixing the price of the contingency agreement with the plaintiff lawyer against the best interests of my sisters 2 surviving children. I was a co-administrator of the estate.
7. After reviewing my price fixing case against attorney Steven Teal with John Boone who said I had an great case, and under his guidance and him reading all of the legal documents, I began my case against attorney Teal for, among other legal theories, price fixing.
8. This case went on for over 5 years and went all the way up to and was heard in the Supreme Court of California. I worked every day and exclusively on this one case about 9 hours a day - week after week - month after month - and year after year.
9. During this time period, I also researched and wrote two Writs of Mandate filed with the court, and drafted a Wrote of Certiorari, but did not file. It was easier to write a book about the case.

10. Then I spent another year writing a book about this case which 2 Deans of USF Law School and many USF law professors have read.
11. In addition to writing this book, I have written a few screenplays – one being a fictional adaptation of Joe Alioto's THE OAKLAND RAIDERS CASE.
12. Dean John D. Trasvina offered me a position as ajs am Adjunct Professor of Law at the University of San Francisco School Of Law.
13. On my only three law suits I have ever I have ever brought, I never agreed to any confidentially agreement.
14. I will never agree to not talk about, or write anything about this case.

As you can see your honor, I may be old and handicapped, but **I am not dead.**

This will be the only case I work on in the next 5 years – and I will work on it 5 hours a day - 6 days a week - week after week - month after month - and year after year.

**BEEN THERE, DONE THAT.**

This case will be litigated to the Supreme Court of the United States of America.

And then I will write a book about it and a feature length screen play about it.

**4 Change of address: I have not received any legal documents from anyone since 12/20 (See EXHIBIT A).**

By this letter let this honorable court know that I need to give this court my change of address.

By the way, I have never lived or work on Union Street, San Francisco. After I sold Green Street in 2009, we moved to Petaluma where we rented 3 homes, and then moved to Santa Rosa and have lived at our present address ever since:

**John Lawrence; Gaddy, Esq.**  
**State Bar of California 74431**  
**2256 Wolfberry Way**  
**Santa Rosa, California 95404**  
**415-601-9942**  
**jhngaddy@gmail.com**

The address above is where I live today so all legal document related to this case can be sent to and emailed to me

5 By this letter let this court and this most honorable Judge that I object to this proposed settlement because it is a very bad deal for the unsecured creditor, and I am one of those unsecured creditors.

Tyler Meade “THE SETTLEMENT IS IN THE BEST INTEREST OF CREDITORS.”<sup>3</sup>- who is praying to this court for \$2,000,000 in attorney fees.

“Don’t pee on my leg and tell me it is raining outside.”

**Judge Judy**

This is a lie; it is not true. This proposed settlement agreement throws the unsecured creditors under the bus.

This group of competitive lawyers individually and as a group are discriminating against me individually as an unsecured creditor and the class of unsecured creditors.

This settlement agreement is not in the best interest of the unsecured creditors – of which I am one – and it certainly not in my best interest.

---

<sup>3</sup> See Page 7 – “Declaration of Tyler Meade in support of Motion to approve compromise of adversary proceeding against Boal and Quotient”



7 6

The truth is that this proposed settlement is in the best interest of Tyler Meade, the Trustee and her counsel and the secured creditors who are going to be paid in full - while the unsecured creditors are going to get about 1/7th of their claims.

Mr. Meade doesn't distinguish between "secured creditors who get **full payment** of priority support obligations" who will get \$309,000 – from – unsecured creditors who look to receive about 1/7 on the dollar to be put into a pool of unsecured creditors.

***"The Trustee believes the settlement is fair and reasonable and is in the best interests of the estate."***

See Page 6 of TRUSTEES MOTION TO APPROVE TRUSTEES MOTION TO APPROVE COMPROMISE OF ADVERSARY HEARING AGAINST STEVEN R. BOAL AND QUOTIENT TECHNOLOGY ...

***"The settlement is in the best interest of the creditors."***

See Page 9 of THE TRUSTEE'S POINTS AND ATHORITIES.

Not true.

It is not in the best interest of the unsecured creditors and discriminates against them for reasons I have already stated.

I put in a claim for \$120,000 and will get about \$16,200 according to my legal advisor attorney Mark Romeo. See EXHIBIT A.

There is a big difference in creditors who get full payment from those unsecured creditors like me who get 1/7 on the dollar.

#### THERE IS A SOLUTION

If Mr. Meade would put 40% of his \$2,000,000 Contingency fee, or \$800,000 into the pool for unsecured creditors, this would increase the pool for unsecured creditors to \$1,341,000 – and be much more equitable for the pool of unsecured creditors, although not completely equitable – and Mr. Meade would still make a killing of \$1,200,000.

I think this is one of many issues that can be appealed all the way up to the United States of Supreme Court.

6. I am asking this court to have the Trustee and her counsel pay me in full my original claim for around \$120,000 for all I have been put through in this case - and with no condition of confidentiality which I will never agree to – by Mr. Fader and the Trustee and her counsel.

See EXHIBIT B

7. By this letter today I am asking this Honorable Judge to order the Trustee and her counsel to put together on as few pages as possible in chronological order all of the money – assets and liabilities and taxes and all of the claims of unsecured creditors including me - which even a truck driver can understand.

I have poured over all 15 legal documents and there money numbers all over the place, but not in one single document.

A lot of these numbers conflict with the numbers that my legal advisor most recently. (See EXHIBIT A)

A good lawyer makes the complex simple to understand.

**FOLLOW THE MONEY** – I want to see every dollar that came in and every dollar that went out; and every expense that was paid, and every expense that has not been paid.

And I want to see what the Trustee and her Counsel have been paid and what they will be paid.

And I want to see what I as an unsecured creditor will get under this settlement, and what I would be paid if I were paid in full my original claim.

### **SUMMARY OF PRAYERS**

1. Please grant me a reasonable continuance of the November 15 hearing scheduled by attorney Tyler Meade for 3 months.
2. Please give this indigent unsecured creditor free legal counsel and money for all costs for as long as this case is litigated. I will also need a free forensic accountant help me where all the money has gone and will go.
- 3 Please change my address to my Santa Rosa address.
4. Please amend the settlement agreement and order Mr. Meade to contribute \$800,000 to the pool for unsecured creditors.

5. Please order the Trustee and her counsel to put together in one document all of the money, past and future, all assets and expenses, including all fees and expenses – past and future in chronological order with a summary on each person who touches the money – so even a truck driver can understand it.

6. Please order the Trustee and her counsel to pay this unsecured creditor to be paid in my the original \$120,000 without any condition of confidentiality for all of the hell Peter Fader put me and my wife through, and for the Trustee and her counsel not agreeing to give me a 3 month extension of this hearing.

I will be on November 15 to answer Judge Montali's or anyone's questions.

This my first zoom call ever.

## EXHIBIT A

Re: Gaddy v. Fader et al. (Fader Bankruptcy)

Our File No. 8659-01

Dear John:

I hope you and your family are well. Since we last corresponded, (12/20) the Trustee has settled the case against Boal and Quotient. The moving papers to approve the settlement are attached. The proof of service indicates these were mailed to an obsolete address so you will probably not get them. The papers explain the net to the estate, which is \$850,000, and after full payment of priority support obligations of \$309,000, leaves a pool for unsecured creditors of \$541,000, to be distributed pro rate to allowed claims. The current claims register shows about \$5.2 million in claims, so your claim is about 3% of that pool.

I was never retained by you, so I am just sending this for your information. You should contact the trustee to give her your current address.

Very truly yours,  
LAW OFFICES OF MARK J. ROMEO



## **EXHIBIT B -**

### **My Experience with Peter Fader –**

**As a tenant at my 3 unit building at 2766 -68 Green  
Street for two years.**

I first met Mr. Fader when he came with his real estate agent to rent my middle unit of my three unit property at 2766-68 Green Street, San Francisco - which is located between Baker and Broderick Streets and is on the S.F. Bay side of Green Street with panoramic views of the Golden Gate.

Green Street is beautiful three unit building has spectacular bay views from the Golden Gate Bridge to the East Bay. The building had been built by my grandfather about 1908.

This building has been lovingly taken by my family (grandparents, parents and I) for approximately 100 years and for all but about ten years a family member has lived in it.

I had been the official manager of this building and two other buildings - totaling 13 units all located in Pacific Heights, San

Francisco - after my father passed away in 1980. Before that I had helped my father take care of the properties.

I grew up in this building with my brother and sister and parents living in the three bedroom two bath middle unit of this 3 unit building - that Mr. Fader would rent - the first 15 years of my life. When I lived with my parents and sister and brother my Grandmother and Aunt Cissy lived in the lower two bedroom one bath owner's street unit.

When Mr. Fader moved into the building for two years my wife Marianne and I had lived in the owner's street unit since 1986 - moving in after we just got married. Again, this was the 3 bedroom, one bath street level unit that my Grandmother and Aunt lived in when I grew up.

I am sorry but today I cannot remember specific dates when his lease began and ended - but he stayed with us approximately 24 months. I believe i was in the very early 2000's. My wife is a witness to everything I say and has a better memory than me.

My family has been in the rental business of renting apartments in San Francisco Pacific Heights for about 100 years. Most of the time we rented out 13 apartments in three buildings Green Street, California Street and Vallejo Street.

In 100 years my family - grandparents, parents and myself (an attorney, real estate broker and apartment manager with deep knowledge of San Francisco rent controlled rental agreements – we have filed only one lawsuit against a tenant and only been sued by one tenant - Peter Fader. My wife Marianne has only been sued by one person - Peter Fader – in her life.

I have only filed three law suits in my life and one being against Peter Fader. I have been an active member of the California Bar for 45 years. No person has ever filed any complaint with the California Bar. I have been married to my wife for 36 years – see EXHIBIT C.

Mr. Fader is the worst tenant, and the most dishonest tenant, and the most destructive tenant we have had in 100 years renting out apartments in San Francisco.

### **Moving in -**

As a matter of good landlord practice all tenants must have two legally responsible adults sign as legally responsible adults. I insisted that I would not lease to Mr. Fader unless he had a co-signer in writing on a lease for. He submitted a lease

form with Ms. Cynthia Dietzman's name on it and submitted it to me as the legally responsible co-tenant and a signature on it representing that it was Ms. Dietzman's signature.

I made one of the worst mistakes of my life believing that the signature was Ms. Dietzman's signature.

It was only years later when I realized after he filed for bankruptcy that I would have to get legal damages from Ms. Dietzman.

It was only then that I would learn from Ms. Dietzman told me that she never agreed to be a legal co-tenant and had never signed the lease form that Mr. Fader gave me. She sent me a copy of her signature that was totally different from the one Mr. Fader submitted at the beginning.

Moreover, MS. Dietzman never moved into the building as he said she would. Mr. Fader lived in my three bedroom two bath unit by himself the entire two years by himself the best I can tell. It is a wood framed building and I lived down below him. I worked out of my home and was home almost every day and night.

## **Living in Green Street for 24 months.**

My grandparents, parents and I have had only three simple rules for tenants - all have followed them for 100 years - except Mr. Fader. 1. Pay the Rent on Time. 2. Take care of the apartment. 3. And follow the Golden Rule - treat others like you would like to be treated.

I cannot think of any tenant today that has not followed all of these simple rules - except Mr. Fader. He broke all of these rules.

### **1. Pay the Rent on Time.**

Mr. Fader was significantly late paying his rent in 10 of 24 months in violation of the lease. One month he was 30 days late on paying his rent.

When Mr. Fader sued me, he also sued my wife Marianne. Green Street is my separate property - Marianne is not an owner it. I inherited Green Street after my mother passed away in 1992.

Like me, Marianne has never been sued by anyone before or since Mr. Fader sued us. All that Marianne did was to collect rent checks from tenants, and to try to get Mr. Fader to pay his illegal late rent - which is totally legal. She always treated Mr. Fader as I did with great respect.

I guess he thought he could sue Marianne for trying him to pay his late payments of rent.

Based on information and belief I had grounds to evict him for so many late payments.

## **2. Taking care of the apartment.**

This is the most important rule because if a tenant does damage to an apartment it not only takes a lot of money to restore it, but I have to take the apartment off the market and therefore lose monthly rent, and I lose the value of my time to supervise the work restoring the apartment to the condition I rented to a tenant it in in the first place..

I cannot today think of any other tenant in 100 years that did more damage to one of our apartments than Mr. Fader.

There had been no work done to upgrade Green Street in my lifetime - I was born in 1945 - when I inherited the building from my mother after her passing in 1992. It is called deferred maintenance.

As an owner, real estate broker and attorney at law I knew that it was a very valuable property – but it needed a lot of work to reach its true value. Pacific Heights Real Estate is some of the most expensive real estate in the world.

Before Mr. Fader moved in I had totally remodeled my top two apartments while Marianne and I lived in the street owner apartment.

After a tenant moved out of my 2 bedroom 1 bath penthouse apartment, I took the apartment off the market for a year and spent over \$500,000 remodeling to it.

This Pacific Heights show piece apartment immediately rented out for \$7000 - which was approximately a \$5,000 increase in rent - to a wonderful tenant who stayed there for over 10 years. I never raised her rent while she lived there.

When the rent goes up, the value of the building goes up and I could borrow more money to fix up the middle unit.

A few years later my 3 bedroom, 2 bath middle unit became available. Like the top penthouse unit, I took the property off the market and spent over \$500,000 and a year of my life remodeling.

This is the apartment I spent my first 14 years living with my brother and sister and parents and the one Peter Fader would rent and live by himself for two year – despite the fact he told me Cynthia Dietzman would be living with him.

Word spread fast about this remodel and I rented it out to a wonderful couple who lived down the street - before finishing the work and not putting it on the market. This couple had one child and one on the way. Best I recall they lived in this apartment for three years until a third child was on its way. They paid \$10,000 a month - which was an approximate \$6,500 increase in rent.

Again the value of the building went way up and I could borrow more money to fix up the entire building – earth quake retrofitting, repaint the building, entire new brick work on the



front of the building, world class gardens front and back, and eventually a three layer new roof.

During the time they lived there I never had one late rent payment and I never had one complaint to fix anything and when they moved out there was no damage to the property - the apartment sparkled and it rented immediately again for \$10,000 a month.

The next tenants were a young couple with no children who lived there for two years. When they moved out they left it a show piece. During the time they lived there was never on late rent payment and never one complaint ever.

Then Mr. Fader moved in. Mr. Fader's monthly rent was reduced to only \$7,000 a month because the rental market in San Francisco had dropped.

I am not going to talk about all of the damage Mr. Fader left me to clean up and restore to the Pacific Heights Show Piece condition I rented it to him in, but I had to take the apartment off the market for about two months to do the work.

Mr. Fader broke my heart how abusively he treated this apartment, my wife and me. And he was a nightmare.

### **3. Follow the Golden Rule -**

**Treat others like you would like to be treated.**

While Mr. Fader lived in my apartment, he would constantly complain that something was wrong with his apartment. During the time he lived in the apartment I had a crew of 1 to 3 men that worked every day improving the property. So I would immediately take my top man with me to fix what he was saying was broken. We never found anything wrong on any occasion that seemed to occur every two months.

Either Mr. Fader was delusional, or he was setting me up for a lawsuit.

Mr. Fader constantly complained that he was paying too much rent (\$7,000) per month when the prior two families had paid \$10,000 per month for his 3 bedroom 2 bath 1450 square foot apartment and the tenant in the penthouse apartment above him was paying \$7,000 for a 1150 square foot 2 bedroom 1 bath apartment.

A week before my wife and mother in law took a one week vacation to Mexico I had the heating unit in the building completely reconditioned the building heater that was only a few years old and also put in a new hot water heater - which hadn't been replaced in more than 20 years.

He sent many messages to us in Mexico hat there was no hot water or heat in the building. I immediately called my top man and got him over to look at the heater and new hot water heater. Guess what? Everything in the boiler room - the heater and the new hot water heater - worked perfectly.

Interestingly, I never got a complaint from my top tenant about this issue.

### **Moving out -**

When Mr. Fader orally told me he was moving out on a Friday on very short notice in violation of the lease agreement which required a 30 day written notice of moving and put into writing the address where is moving.

I asked him orally where he was moving to and to please put his notice of moving out and the address where he is moving in writing - as the lease required.

He refused to do as I asked.

He never put his notice moving out in writing or the address that he was moving to in writing. All he said was that he was moving out on the next Friday.

On Thursday, the day before he said he was moving out, I awoke to lots of noise. Movers were moving out all of Mr. Fader's furniture and belongings.

I called a private investigator to come out so we could follow the movers in separate cars and find out where Mr. Fader was moving.

While I was standing outside and watching the movers pack, Mr. Fader came outside from his upstairs apartment and walked by me. Again I asked him what address he is moving to. He ignored me and refused to answer my question and he proceeded to a car after telling me he was going nuclear on me - whatever Going Nuclear means - and left the scene.

The investigator and I followed the moving van in separate cars to an apartment near Cost Co in San Francisco. The neighborhood ( I believe 10<sup>th</sup> Street) is a real step down from Green Street, San Francisco, with bay side of the street with panorama views from the Golden Gate Bridge to Alcatraz to the East Bay.

### **Conclusion -**

One hundred and twenty dollars (\$120,000) is not enough money in damages Peter Fader caused Marianne and me, and it does not begin to cover the pain and suffering he gave us.

**HOW YOU TREAT ONE PERSON IS HOW YOU TREAT ALL PEOPLE**

IF SOMEONE TREATS YOU BADLY REMEMBER,  
THERE IS SOMETHING WRONG WITH THEM, NOT YOU.

**NORMAL PEOPLE DON'T GO AROUND TRYING TO DESTROY OTHERS.**

Sue Swink

The lesson I was taught by attorney John H. Boone on my first day of my first law job at the Office of Frederick Furth was -

**"If a client Loses credibility, the client will lose his case - even a great case."**

Attorney John Hasslet Boone<sup>4</sup>

Mr. Fader is a very dishonest person at the very least and has no credibility.

**If debtor Fader dishonors written agreements like this, how can anyone believe his oral agreements?**

Anyone who believes Mr. Fader like I did will live to regret it. How he treated me and my wife is how he treated his employees based on me talking to at least one.

---

<sup>4</sup> Fred Furth and John Boone put together – THE ANATOMY OF A SEVENTY MILLION DOLLAR SHERMAN ACT SETTLEMENT/

I am not a litigator. I know very little about bankruptcy law. I have not heard anything about this case in almost two years. In fact i thought the case was over. I have never received a legal document from the trustee and I am an Unsecured Creditor. I have critically relevant information going to the credibility of Peter Fader which the bankruptcy court should hear. And I have a corroborating witness - my wife Marianne.

## EXHIBIT C

This is a copy of an email I sent to Miriam Manning and Matt Caplan so that they would understand the frail nature of Marianne and my health - Marianne is sixth year of Parkinson's disease and I have serious vision issues. Marianne is 74 and I am 77.

### **My Chronic Fatigue.**

I believe I have chronic fatigue syndrome caused by my 7 plus years journey into blindness. In the last 7 years I have had 4 surgeries on my left eye - detached retina, cataract, and macula pucker and finally the complete removal of my left eye.

When I get tired, and it is very often, I must go to bed - and this can be at any time of day or night. Sometimes I am awake all night and have to sleep all day.

My right eye - which is the only eye I have left - has a severe cataract in it. I avoid doing cataract surgery in my only good eye because four out of the last five people I have talked to have had bad results and won't do a second surgery on their remaining good eye. I do not have a remaining good eye left.

My vision in my right eye is so dark and sometimes very blurry that reading and writing very hard and very tiresome for me. I do



not recall today writing any email since my last 12/20 emails with Mark Romeo.

It has been very hard and tiresome to write the emails I have been writing to you. And it has taken me a long time to do it.

I am legally handicapped for the above eye issue. and for other independent reasons.

I have also fallen down twice during the last ten years. The first time I hit my head on the sidewalk in front of a Chinese Restaurant and the second time I fell outside a laundry and broke my shoulder which required surgery. I was in pain for the second fall for over a year and have not come close to recovering range of motion since then. I now use a cane to help keep my balance everywhere - even in my house. I got lucky. People die from falls every day.

Falls are the leading cause of death for seniors, and I am 77 years old. I do not have another fall in me.

I am covered by The American Disability act

I do not leave my house as a general rule except to get groceries and take our clothes to get washed.

## **Marianne's Parkinson Disease.**

A little more than 5 years ago my wife of over 35 years (we got married in 1986) got diagnosed with Parkinson's disease.

Since this devastating news, I have dedicated my life to make Marianne's life as comfortable as possible. I do all grocery shopping, cooking and dishes. I do all of the cleaning of the house. I make sure all of our cloths are clean. I help my Marianne getting dressed in the morning and undressed at night. I give Marianne massages every day. There is absolutely nothing to help Marianne and make her life with Parkinson's disease as easy as possible that I won't do.

I am the luckiest man on earth to have Marianne as my wife.

"A life without love in it is no life at all."

Leonardo Da Vinci

Love is not being loved, but giving love.

"True love is a love of giving, not receiving,"

Piyu Dguupta

Peter Fader not only brought a frivolous law suit against me, but he also sued my Marianne.

My three unit building at 2766 - 68 Green Street was my inheritance and therefore my separate property. Marianne had no legal interest in Green Street.

The only thing Marianne was guilty of in her interactions with Mr. Fader was to be extraordinarily kind to him and to treat him like family which was how my grandparent, my parents and I treat all of our tenants.

All Marianne did was to try to get him to pay the late rent in violation of the lease which on one occasion was 30 days late. As best I recall today is that Mr. Fader was very late in paying his rent 10 of the 24 months he lived there.

Again, I will call you later today after you acknowledge receiving and reading this email.

Among other things, I need you to explain the history of litigation in this case.

Sincerely Yours,

## EXHIBIT D

"Counsel for E. Lynn Schoenmann,  
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PETER R. FADER

dba Urchin Capital Partners

dba Urchin Partners LLC,

Debtor.

Case No.: 08-30119-DM

## Chapter 7

# NOTICE OF HEARING ON MOTION TO APPROVE COMPROMISE OF ADVERSARY PROCEEDING AGAINST STEVEN R. BOAL AND QUOTIENT TECHNOLOGY PURSUANT TO FRBP 9019

### Hearing Date:

**Date: November 15, 2022**

**Time: 11:30 a.m.**

**Place: Telephonically or by Video**

**Judge: Honorable Dennis Montali**

**Objection Deadline: October 28, 2022<sup>5</sup>**

---

<sup>5</sup> I have been led o believe by Trustee's counsel that the Objection Deadline was November 8, 2022: Please look at the last email she sent me

**"Miriam Manning**  
to Kenneth, me

Fri, Nov 4, 8:49 AM (1 day ago)

Thank you for your email Mr. Gaddy. It is not in the best interest of the estate to continue the November 15, 2022 hearing date. If you believe an objection to the proposed settlement is warranted, please proceed to file an objection by the November 8 deadline.

Miriam"

PLEASE TAKE NOTICE THAT the Bankruptcy Court will hold a hearing on the Trustee's Motion to Approve Compromise of Adversary Proceeding against Steven R. Boal and

Quotient Technology Pursuant To FRBP 9019 (the "Motion") on November 15, 2022 at 11:30\_a.m. (Pacific Time) before the Honorable Dennis Montali, United States Bankruptcy Judge.

The Motion is filed by E. Lynn Schoenmann, the duly appointed Chapter 7 Trustee ("Trustee") of the bankruptcy case of Peter R. Fader (the "Debtor").

Case: 08-30119 Doc# 101 Filed: 10/19/22 Entered: 10/19/22 09:38:03"

## EXHIBIT E

Things I noticed about the Proof of Service:

1. Attorney Mark Romeo not only received service by mail, but also electronically.
2. Service was only sent to Marianne's by mail old business address on Union Street: 2227 Union Street, SF, CA 94123. She had moved out years ago. I never had a business at this address and never worked at it
3. Neither of us had ever lived at this address. No service was ever sent to our home or by email by the Trustee except Mr. Romeo
4. Neither of us was sent any legal document of this case electronically/email by the Trustee except Mark Romeo – who had not sent me anything in the last two year.
5. Mr. Romeo had been sending information and legal documents about this case until December 2022 – and that ended on 12/30. See EXHIBIT A

6. We have not seen any legal documents about this case  
anyone in almost two years until most recently. See  
EXHIBIT A

I have put a copy of the proof of service with irrelevant  
information deleted from it.

---

Kenneth H. Brown (CA Bar No. 100396)  
Miriam Manning (CA Bar No. 178584)  
PACHULSKI STANG ZIEHL & JONES LLP  
One Sansome Street, 34th Floor, Suite 3430  
San Francisco, CA 94104  
Telephone: 415/263-7000  
Facsimile: 415/263-7010  
E-mail: kbrown@pszjlaw.com  
mmanning@pszjlaw.com  
Counsel for E. Lynn Schoenmann,  
Chapter 7 Trustee



UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PETER R. FADER

dba Urchin Capital Partners

dba Urchin Partners LLC,

Debtor.

Case No.: 08-30119-DM

Chapter 7

CERTIFICATE OF SERVICE

Case: 08-30119 Doc# 102 Filed: 10/19/22 Entered: 10/19/22  
09:40:44 Page 1 of 7

DOCS\_SF:108074.1 77354/001 2

PACHULSKI STANG ZIEHL

& JONES LLP ATTORNEYS AT LA W

SAN FRANCISCO, CALIFORNIA

STATE OF CALIFORNIA, CITY OF SAN FRANCISCO

)

I, Oliver Carpio, am employed in the city and county of San Francisco, State of California.

I am over the age of 18 and not a party to the within action; my business address is One Sansome Street, 34th Floor, Suite 3430, San Francisco, CA 94104.

On October 19, 2022, I caused to be served the following documents in the manner stated below:

☐ NOTICE OF HEARING ON MOTION TO APPROVE  
COMPROMISE OF ADVERSARY PROCEEDING AGAINST STEVEN  
R. BOAL AND QUOTIENT TECHNOLOGY PURSUANT TO FRBP  
9019

☐

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC  
FILING (NEF):**

Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On October 19, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic

Mail Notice List to receive NEF transmission at the email addresses stated below ☐ (BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S.

Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ **(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.**

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on October 19, 2022 at San Francisco, California.

/s/ Oliver Carpio

Legal Assistant

Case: 08-30119 Doc# 102 Filed: 10/19/22 Entered: 10/19/22  
09:40:44 Page 2 of 7

DOCS\_SF:108074.1 77354/001 3

PACHULSKI STANG ZIEHL  
& JONES LLP ATTORNEYS AT LA W  
SAN FRANCISCO, CALIFORNIA

Peter R. Fader

Case No. 08-30119-DM

SERVED VIA ECF

o William F. Abbott [billabbott@earthlink.net](mailto:billabbott@earthlink.net),  
[warrentwooesq@cs.com](mailto:warrentwooesq@cs.com)

o Tracy O'Driscoll Appleton [tappleton@dnfllp.com](mailto:tappleton@dnfllp.com),  
[paralegals@dnfllp.com](mailto:paralegals@dnfllp.com)

o Bachecki, Crom & Co., LLP [JCrom@bachcrom.com](mailto:JCrom@bachcrom.com)

o Peter J. Benvenuti [pbenvenuti@kbklp.com](mailto:pbenvenuti@kbklp.com)

o Kenneth H. Brown

[kbrown@pszjlaw.com](mailto:kbrown@pszjlaw.com), [carpio@pszjlaw.com](mailto:carpio@pszjlaw.com)

o Victor Chiu [vchiu@keker.com](mailto:vchiu@keker.com), [VFujisawa@keker.com](mailto:VFujisawa@keker.com)

o Patricia A. Cutler [patricia.cutler@usdoj.gov](mailto:patricia.cutler@usdoj.gov)

o Loren Kieve [lk@kivelaw.com](mailto:lk@kivelaw.com)

o Marc A. Levinson [Malevinson@orrick.com](mailto:Malevinson@orrick.com),  
[casestream@ecf.courtdrive.com](mailto:casestream@ecf.courtdrive.com)

o Miriam Manning [mmanning@pszjlaw.com](mailto:mmanning@pszjlaw.com),  
[ocarpio@pszjlaw.com](mailto:ocarpio@pszjlaw.com)

o Tyler Meade [tyler@meadefirm.com](mailto:tyler@meadefirm.com)

o Office of the U.S. Trustee / SF  
[USTPRegion17.SF.ECF@usdoj.gov](mailto:USTPRegion17.SF.ECF@usdoj.gov)

o Mark J. Romeo romeolaw@msn.com

□ E. Lynn Schoenmann tteeschoenmann@earthlink.net,  
lschoenmann@ecf.axosfs.com

**SERVED VIA US MAIL (MATRIX)**

....

Cynthia Dietzmann

P O Box 712

5705 Fish Creek

Wilson WY 83014-0712

Peter R. Fader

4 65 10th Street

Apartment 401

San Francisco, CA 94103-4362

**John Gaddy**

**2227 Union Street**

**San Francisco CA 94123-3901**

**Mark J. Romeo**

**Law Offices of Mark J. Romeo**

**235 Montgomery St., #400**

**San Francisco, CA 94104-2921**

**Urchin Capital Partners**

**124 Cabrillo Street**

**San Francisco CA 94118-4023**

**Urchin Partners, LLC**

**655 Montgomery Street**

**Suite 900**

**San Francisco CA 94111-2688**

**Venture Spark**

**Attn: Marianne Gaddy**

**2227 Union Street**

**San Francisco CA 94123-3901**

**MARK J. ROMEO**

**LAW OFFICES OF MARK J. ROMEO**

**130 Sutter Street, 7 Floor th**

**San Francisco, CA 94104**

Counsel for Quotient Technology Inc.

Matt Caplan

Jayme B. Staten

Cooley LLP

3 Embarcadero Center, 20th Floor

San Francisco, CA 94111-4004

Email: mcaplan@cooley.com

jstaten@cooley.com



## EXHIBIT F

My Background – 3/21/1945 to present

I am a graduate of Saint Vincent de Paul on Green Street. I walked to and from SVdeP every day going there. It was just over the hill from where I lived.

I went a year and one half to Saint Ignatius High School in San Francisco and graduated from Sir Francis Drake High School near San Anselmo, California.

I went to the University of San Diego on a four year full ride basketball scholarship and also earned a teaching credential there.

I was a teacher in San Francisco for two years before going to the University of San Francisco School of Law

For all but ten years of my 45 year legal career I have not been involved in any litigation. My whole career has been as an owner and manager of real estate in San Francisco – even before becoming an attorney.

I know very little about litigation or bankruptcy law.

I have no money to hire an attorney – especially since I am only entitled to around \$16,000 dollars if this settlement is blessed by this Honorable Court. My original claim was for around \$120,000.

**Graduate of the University of San Francisco School of Law –  
1970 – 1973.**

First year rank, 3 rd. in Class, and my best recollection 50 years later – first in class in the Law of Contracts.

Third year clerkship with the Judges of the National Labor Relations Board which were then located in the Federal Building at 450 Golden Gate Avenue.

**1973 – 1977**

After Law School I started a clerkship with the Law Office of Frederick P Further – working under his number 2 person – John H. Boone. His office at that time was in the Russ Building – at 235 Montgomery Street.

Mr. Furth's Law Office practiced plaintiff complex business litigation generally, and Plaintiffs Antitrust Law in particular.

Both Mr. Furth and Mr. Boone came out of the Law Office of Joe Alioto Sr. They were just wrapping up the Gypsum litigation – In re Gypsum Cases, 386 F. Supp. 959 (N.D.) – which was the largest class action Sherman Act price fixing case in the history of the United State at the time.

There was no word processors or the internet then. Lawyers worked in teams with a real pecking order. Everybody worked hundred hour weeks and secretaries came around the clock in three shifts. I slept in my office most nights on the floor.

We ate at Sam's Grill and seafood Restaurant lunch and dinner with an open account.

### My father's stroke and heart attack

Then my father had a stroke and then a heart attack. I took a leave of absence from legal work and visiting my father at was then Letterman hospital – always bringing him a chocolate milk shake.

I went back to work and learn under Mr. Boone. I worked a total of 5 years and then had an anxiety attack that felt like a heart attack. I spent 13 days in the hospital most of the time being given oxygen in the intensive care unit.

I never went back then, nor ever, to work in a law firm. I went back to helping my mother and getting a real estate license.

I then worked as a real estate agent half time and helped my mother manage or real estate the rest of my time.

My father passed away in 1980.

I then became very interested in American Screen plays and bought a word /computer and taught myself Word Perfect 5.1

The first screenplay I wrote was a fictional adaptation of Joe Alioto Sr's THE OAKLAND RAIDER'S ANTITRUST CASE AGAINST ALL OF THE NFL TEAMS – who refused Al Davis and Joe Alioto's written request to move the Oakland Raiders team to Los Angeles.

1986 – My younger sister Leslie, a mother of two minor children died in a tragic auto accident near Santa Rosa. She was also at fault in causing the death of a mother with two minor children.

I became a co-administrator with my younger brother Bill being the other co-administrator at the request of my mother.

After a lot of research we hired a Santa Rosa attorney Steve Teal to be both defend Leslie's estate from the expected law suit and to be her estate lawyer.

Leslie left no will and had no insurance to cover the wrongful death claim and to pay attorneys.

Bill lived four hours away and had no education or experience in legal matters. My mother asked me to do all of the negotiations for my sister's children.

Before any legal papers were filed the attorney for the family that Leslie accidentally killed - she left surviving two children and a husband – called Mr. Teal and made a settlement offer – presumably a standard contingency 1/3 before filling papers.

When I looked at this offer on the surface it was a very good offer for Leslie's two children. As best I recalled the offer was around \$180,000. And at that time it looked like Leslie's total assets were around \$400,000 which left \$220,000 for Leslie's children.

On closer inspection, as the co-administrator assigned to protecting Leslie's children, I thought the plaintiff's lawyer was getting too much money –  $1/3 \times \$180,000 = \$60,000$ .

That leaves \$120,000 for the children of the mother my sister accidentally killed

I do not think the plaintiff's lawyer did 10 hours of work. So he would be getting \$6,000 in (1) a case of uncontested and stipulated liability, and (2) a case with very little money in it.

All that was at question what was the value of the case.

After pondering this idea for a while I instructed Mr. Teal to send a counter offer where Leslie's estate offers \$150,000 and the Plaintiff's lawyer only takes 20% of the \$150,000 = \$30,000 for less than 10 hours of work.

That leaves \$120,000 for the children of the mother my sister accidentally killed.

And it saved Leslie's children \$30,000.

It surprised me that Mr. Teal would refuse to submit my counter off which benefitted Leslie's children.

I called up my mentor in Anti-Trust Law and showed him the above situation. He told me that it was price fixing to him. And he explained the theory and case law as how you would prove this price fixing case.

Mr. Boone told me to send Mr. Teal a letter and repeat my instructions of my counter offer for Mr. Teal to send to the Plaintiff lawyer.

Mr. Teal sent back a letter he cannot send my offer because there was a law against him doing so.

Then John Boone sent Teal a letter saying he knew of no such law and asked Mr. Teal to send him a letter telling John what law would be violated.

To this day Teal never responded to Mr. Boone's request because no such law exists.

That began 5 plus years of litigation – **The Estate of Leslie Gaddy vs. Steven Teal – which was an Unpublished Opinion.**

I did all of the research and appellate writing all the way up to the Supreme Court of California on this case, plus two Writs of Mandate, and a Writ of Cert that I did not file with the United States Supreme Court.

I worked only on this case to the exclusion of all other work 8 hours a day, week after week, year after year for more than 5 years.



Interestingly, after the case was over and I was writing spending another year on a book about this case - I found a long detailed article in Forbes magazine saying that lawyers were price fixing contingency fee agreements and it was costing consumers 10 billion dollars a year.

I then went back to real estate.

A number of years later I went to a class reunion at the USF School of Law. I met the Dean of USF Law School John J Trasvina – (Dean 2013 – 2018) - and told him about this case and my book about it. At his request, I sent him a copy of the book.

I also told him at the time of my dream to teach two classes at the school – The Law of Contracts and a course of screen writing for lawyers.

He told me that only full time faculty can teach a core course like The Law of Contracts, but he offered me an adjunct professor position basically allowing to teach “a small” course.

EXHIBIT G.

*"My task...is make you hear, to  
Make you feel – and above all, to make  
You see. That is all, and it is everything."*

*Joseph Conrad*

**THE LAWYER ON A HERO'S JOURNEY: Crafting a Winning Story!**

**The Introduction to Story Class<sup>6</sup>**

***"Unlocking secrets of story unlocks the secrets of the mind.  
Unlocking the secrets of the mind awakens the power of  
Story within you. Work with that power and you can steal  
Fire from the gods. Master that power and you can create  
Stories that live forever."***

**Accomplish this and you will go far beyond creating a winning  
story.**

---

<sup>6</sup> This is a first draft of a class I considered teaching at USF School of Law. As yet it has not been submitted to the school for its consideration.

We are in a world where we spend a lot of our time escaping life and being entertained by watching movies and television. We are conditioned to view well-crafted stories written and edited by professional story tellers. We have become a very critical society where we have no patience to read, listen or watch a poorly told story – article, book or film.

Whether they realize it or not, judges and juries are conditioned by movies and television to be entertained by well-crafted stories. We all like to watch a movie “based on, or inspired by, a true story.”

As a society we have an expectation to read, hear, or see entertaining stories by professional writers. And if we do not get the entertaining stories we expect, we mentally check out. And so do juries and judges.

The winning stories not only entertain us, but also educate us. The great stories touch us deeply and we want to see them again and again. Why do we want to read, hear, or see these stories told again and again?

There is much to be learned by law students and lawyers from movie makers about telling a story that wins the heart and mind of our audience – whether the audience is a judge, or jury, or an opposing lawyer, or the reader of a letter or an article in a newspaper. A lawyer who knows how to craft a winning story will develop a competitive edge.

A lawyer's paint brush is her pen and her paint are her words which are constrained by the facts she can muster on behalf of her client. While a lawyer cannot make up the facts, she can dramatically structure the facts to tell a story that can help him win his case. A lawyer may have great facts to use to support his case, but if she doesn't know how to structure and tell the story in a non-boring way, she may lose his audience and eventually his case.

*This is a class about crafting a winning story from the facts of the lawyer's case so that the judge, jury or reader of the story wants his client to win the case. It is also a class where law students or lawyers will learn how to write a screenplay from one of their cases or to write a novel or narrative non-fiction book that is structured like a screenplay, and reads like a movie – just like John J Osborn, Jr., author of THE PAPER CHASE.*

*John J. Osborn was number one in his class in contracts. He was a professor of law at the USF School of Law (1991 – 2018) where he taught The Law of Contracts and a writing class, among other classes.*

A lawyer can learn to structure his story and shape his sentences to captivate his audience just like a Hollywood filmmaker does.

John Grisham knows how to tell a story. His fictional books are known to read like movies. And for this reason most of them have been turned into movies. He is worth over 100 million dollars today because he knows how to tell and market a story.

Is it an accident or mere coincidence that his books read like movies? Or is there a secret to how he writes his winning stories?

Does John Grisham just sit down in front of his word processor and type out a book in six months off the top of his head? The answer is no. He says he plans and structures his stories anywhere from eighteen months to five years researching and doing a detailed outline of the story before he starts writing. Grisham says that the more time he spends on the outline and structure before he starts to write; the easier it is for him to write. Then he writes a good structured first draft, and turns that good first draft into a great story by lots of re-writing and polishing.

I have created an approach based on years of study and writing that will help a law student craft a winning story using specific techniques developed by Hollywood screenwriters do which in turn can be used in a lawyer's brief or in presenting an argument to a judge and jury.<sup>ii</sup>

In this first class the students will be taught how to craft a good outline of their story draft. I will use two books by Syd Field, i.e., First, SCREENPLAY: The Foundations of Screenwriting and, second, THE SCREENWRITER'S WORKBOOK.

Then the law student will learn to re-write and transform their good first draft story into a great story. I will use Linda Seger's book MAKING A GOOD SCREENPLAY GREAT.

This course covers 85–90% of great story telling.

#### A: The Foundation:

If a house does not have a good foundation, it will fall down no matter how you build the home on top of the foundation. Like a house, if a story does not have a sound structural foundation, it will fall down.

The law student will learn about the classic three-act structural paradigm. Act One is called the set-up and is 25% of the story; Act Two is called the confrontation, and is 50% of the story; and Act Three is the Resolution, and is 25% of the story.

Students will learn how important it is to know the ending, beginning, and plot points one and two before they start to structure/plan their story.

Like an anatomy class that has a cadaver to dissect, my class will have a movie screenplay to dissect. As the students begin to learn solid screenplay structure that is applied to every Hollywood movie, they will analyze the shooting script of the movie **ERIN BROCOVICH**, as well as their four-page story they wrote as part of the first class assignment.

They will learn how to paint with words to create a sympathetic main character, which will ultimately be their client. Then they will go through each act and marshal their facts to craft a good first draft.

## B. Writing is Re-Writing:

After a student has a good first draft, the real work begins. Great writing requires

Re-writing. The purpose of this part of the introductory course is to teach a student how to rewrite quickly and efficiently, while keeping the magic for that important last draft.

There are specific elements that make a good story great, elements that can be consciously analyzed and improved.

The first step is to identify problems, then define the concepts and find a solution to the story problems before you start to rewrite the story. Otherwise your story can get worse and worse in the rewrite process.

The three major areas to improve are story structure, idea development, and character development:

1. What can we do to improve the three-act structure? How do we make the subplot work? How do we keep Act Two moving? How do we create a more cohesive story?
2. How do we make our story idea more compelling? How do we create the myth? The concept of “creating the myth” is discussed in depth in the Advanced Story Class.
3. How do we improve character development? How do we find the character spine from motivation to goal? How do we find the character conflict? How do we create more dimensional characters? Do we have too many characters without a character function?

After a law student has done a thorough re-write job – by identifying all of the story problems, defining the concepts, and finding a logical solution to the problems in the story structure, idea development, and character development – he should have a great story to present to a judge and jury on behalf of his client.

But the story still can be told in an even better way to connect to your audience. The other 10-15% of crafting a winning story is learning how to turn that great re-written story into a mythic story. That is what the advanced class is about. This is where the Hero’s Journey and the Golden Paradigms are discussed in depth.



## **CONCLUSION**

If a law student has taken the Introduction to Story Class, attended class and done the work, he has a very good foundation on the classic Structural Paradigm.

This draft can re-written using a methodology taught in this class that will turn that good first draft into a great story.

A lawyer needs to know how to craft and tell winning stories throughout his legal career – which includes a lot of factual writing which must be turned into a compelling story.

By learning how to craft a great story from the facts of his case, a lawyer is going to be a much more effective lawyer communicating his client's case to a judge, or jury, or an opposing lawyer, or the reader of a letter or in an article to a newspaper.

## **REQUIRED BOOKS**

1. SCREENPLAY: The Foundations of Screenwriting by Syd Field.
2. THE SCREENWRITERS WORKBOOK: Exercises and Step-By-Step Instructions for Creating a Successful Screenplay, by Syd Field.

### **REQUIRED SCREENPLAYS**

3. **A BEAUTIFUL MIND**, the Screenplay and DVD.

My favorite book and movie of all time.

4. **THE PAPER CHASE**, the screenplay and DVD.

By USF Law Professor (1991) John J. Osborn, Jr.

5. **A CIVIL ACTION**, the screenplay and the DVD.

A great movies about a lawyer who doesn't when his case, but the truth is told about why he lost the case with great emotional subtext.

### **OTHER HELPFUL BOOKS**

1. **HOW TO WRITE A MOVIE IN 21 DAYS: The Inner Movie Method**, by Viki King.
2. **MAKING A GOOD SCREENPLAY GREAT** by Linda Seger.
3. **ON WRITING WELL: The Classic Guide to Writing Nonfiction** by William Zinser.
4. **THE ELEMENTS OF NARRATIVE NONFICTION: How to Write and Sell the Novel of True Events** by Peter Rubie.

5. THE INNOCENT MAN, a non-fiction book by John Grisham.
6. ERNEST HEMINGWAY ON WRITING, edited by Larry W. Phillips.
6. **SERPICO**, the screenplay and DVD.
7. ERIN BROCKOVITCH, the shooting script and DVD.
8. **ROCKY I**, the screenplay and DVD.

## EXHIBIT H.

*"My task...is make you hear, to  
Make you feel – and above all, to make  
You see. That is all, and it is everything."*

*Joseph Conrad*

### **THE LAWYER ON A HERO'S JOURNEY: Crafting a Winning Story!**

#### **The Advanced Story Class**

Students cannot take this class unless they first take the introductory foundation class.

Students will learn that the story can still be told in an even better way to connect to your audience than what they learned in the introductory class.

The other 10-15% of crafting a winning story is learning how to turn that great re-written story into a mythic story. This is where the Hero's Journey and the Golden Paradigms are discussed in depth.

The "Advanced Story Class" will be another fourteen-week series of classes that will build on the foundational structure learned in the

introductory class. The students will learn concepts to turn their great story (one that is already well structured and re-written) into a Hero's journey myth.

Seven of the ten most successful films made in the history of Hollywood were made by George Lucas and Steven Spielberg. When George and Steven were asked what separated them from the other Hollywood filmmakers, they acknowledged Joseph Campbell's work on the hero myth – **THE HERO OF A THOUSAND FACES**.

Clint Eastwood and Sylvester Stallone also use this technique in their work by dramatizing the hero myth in their own particular ways.

Joseph Campbell's **THE HERO WITH A THOUSAND FACES** is a statement of the most persistent theme in oral tradition and recorded literature – the myth of the hero.

A myth is a story that is "more than true." A myth is more than true because it is lived by all of us at some level. It's a story that connects and speaks to us all. A myth is the "story beneath the story."

By incorporating the Hero myth into a well-structured and well re-written story, this deepens the story beyond great story telling so that the story glows with some of the same sense of wonder and excitement as myths.<sup>iii</sup>

The student will try to apply **the HERO'S JOURNEY PARADIGM** over **the CLASSICAL STRUCTURAL PARADIGM** to transform our great story into the realm of the hero myth. This makes our individual story larger than life and connects to a larger audience.

The second part of the Advance Story Class will be devoted to trying to understand author and writer John Bonnet's concept **of the GOLDEN PARADIGMN** on top of sound story structure, great re-writing, and The Hero's Journey Paradigms.

The work of John Bonnet is his continuation of the work begun by Carl Jung and Joseph Campbell. Bonnet believes he has put forth revolutionary new ideas concerning the nature and purpose of story, the meaning of metaphor and myth, the creative unconscious, and the art of story making.

Bonnet calls his important new modes of the human psyche **THE GOLDEN PARADIGMN**, which was brought to light by intriguing new patterns discovered hidden in great stories.

The special emphasis is on how the great myths and legends were really created and how contemporary stories with that kind of magic power can be created again.

Students will learn how to tap powerful creative sources deep within themselves and be able to use modern metaphors to create stories as significant for today as KING ARTHUR and THE ILLIAD were for their time.

***“Unlocking secrets of story unlocks the secrets of the mind.  
Unlocking the secrets of the mind awakens the power of  
Story within you. Work with that power and you can steal  
Fire from the gods. Master that power and you can create  
Stories that live forever.”<sup>iv</sup>***

Accomplish this and you will go far beyond creating a winning story.

## **CONCLUSION**

If a law student has taken the Introduction to Story Class and attended class and did the work, he has a very good foundation on the classic Structural Paradigm which can be re-written using a methodology taught in this class and turns that good first draft into a great story.

If a law student has also taken the Advanced Story Class, then he will know how to apply The Hero's Journey Paradigm over the Classic Story Paradigm to craft and transform his great story into a mythic story.

By learning how to craft a great story, and possibly a mythic story, from the facts of his case, a lawyer is going to be a much more effective lawyer communicating his client's case to a judge, or jury, or an opposing lawyer, or the reader of a letter or in an article to a newspaper.

### **REQUIRED BOOKS:**

9. THE WRITER'S JOURNEY by Christopher Vogler.
10. THE HERO WITH A THOUSAND FACES, by Joseph Campbell.
11. THE WRITER'S JOURNEY: Mythic Structure for Storytellers and Screenwriters by Christopher Vogler.
12. MYTH AND THE MOVIES: Discovering the Mythic Structure of 50 Unforgettable Films by Stuart Voytilla.
13. STEALING FIRE FROM THE GODS by James Bonnet.

### **OTHER HELPFUL BOOKS**

14. ROCKY II, the screenplay.
15. THE INNOCENT MAN by John Grisham.<sup>v</sup>



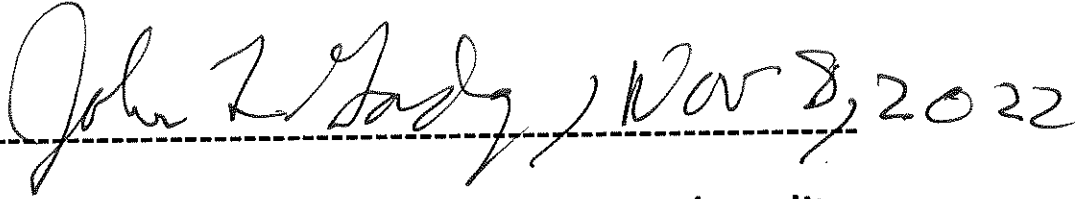
---

SERVICE BY MAIL AND EMAIL

I, John Lawrence Gaddy, have served this legal document to Judge Montali regarding debtor Peter Fader and this proposed settlement agreement on November 8, 2022 for a scheduled November 15 scheduled hearing.

I have done all of the research and writing in this almost 90 page legal documents. This will be my first ZOOM CALL ever.

I have **served by mail** on this bankruptcy court this legal document with my objections - plus a lot of background about this case relevant to my legal objections - and a little about me - as best I could **on November 8, 2022 – the objection deadline.**

A handwritten signature in black ink that reads "John L. Gaddy, Nov 8, 2022". The signature is written over a horizontal dashed line.

**John Lawrence Gaddy, an unsecured creditor**

Judge Montali

450 Golden Gate Avenue

Mail Box 36099

San Francisco, CA 94102

888 – 821- 7606

I have served by mail and by email the following:

to Defendants:

to Elliot Peters

EPeters@keker.com

Brook Dooley

BDooley@keker.com

Keker, Van Nest & Peters LLP

633 Battery Street

San Francisco, CA 94111-1809

415-391-5400

*John Z. Thedy*  
*Nov 8, 2022*

**And to:**

Matt Caplan

mcaplan@cooley.com

Cooley LLP

3 Embarcadero Center • 20th Floor

San Francisco, CA 94111-4004

415-693-2164

to the Trustee:

Kenneth Brown

kbrown@pszjlaw.com

Pachulski Stang Ziehl & Jones LLP

One Sansome Street, Suite 3430

San Francisco, CA 94104

415-263-7000

*John T. Gaddy*  
*Nov 3, 2022*

And to:

Tyler Meade

tyler@meadefirm.com

The Meade Firm p.c.

12 Funston Ave., Suite A

San Francisco, CA 94129

415-724-9600

Case: 08-30119 Doc# 100-2

John L Gaddy, Nov 8, 2022  
**John Lawrence Gaddy, an unsecured creditor**

---

<sup>ii</sup> My approach to teaching this law school class today will be to teach with kindness and encouragement and that students will also learn from each other. Students will partner-up and critique each other. Not only will they get constructive criticism from their writing partner, but they will see how the other student approached the exercise.

Classroom attendance is a must, and homework and exercises will be given for every class.

<sup>iii</sup> A Summary of the stages of the HERO'S JOURNEY PARADIGMN as applied to the CLASSIC STRUCTURAL PARADIGMN is:

In Act One our hero is introduced in the ORDINARY WORLD, where he receives a CALL TO ADVENTURE. Our HERO IS RELUCTANT AT FIRST to answer the call because he is afraid, but then he is encouraged by a WISE OLD MAN OR WOMAN (MENTOR) to answer the call and cross the first threshold and ENTER THE SPECIAL WORLD.

In Act Two our hero encounters TESTS, ALLIES AND ENEMIES in the special world. Eventually he must enter the INMOST CAVE and confront his greatest fear, which is the second threshold, where he endures the SUPREME ORDEAL. Then he SEIZES THE SWORD.

In Act Three our hero is pursued on the ROAD BACK to the ordinary world. There our hero crosses the third threshold, and experiences a RESURRECTION, and he is transformed by the experience. At last he RETURNS WITH THE ELIXIR, a boon or treasure to benefit the ordinary world.

P

US POSTAGE PAID

\$9.00

Origin: 95401  
11/08/22  
0569980662-30

PRIORITY MAIL®

0 Lb 14.30 Oz

1021

EXPECTED DELIVERY DAY: 11/09/22

C004

SHIP

TO:

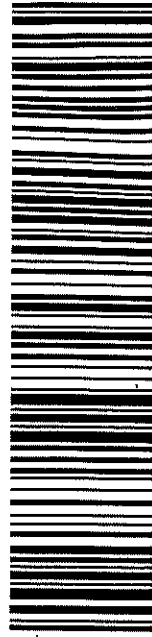
450 GOLDEN GATE AVE

STE 36099

SAN FRANCISCO CA 94102-3410



USPS TRACKING® #



9505 5145 0828 2312 7032 02



FROM: John Lawrence ; Gaddy Esq.  
2256 Wolfberry Way  
Santa Rosa, CA 95404

TO: Judge Montali  
450 Golden Gate Avenue  
Mailbox 36099  
San Francisco, CA 94102

RECEIVED

NOV 10 2022

U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

